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***Attorneys for Defendants/Counterclaim
 Plaintiffs BrandTotal, Ltd. and Unimania,
 Inc.***

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO/OAKLAND DIVISION**

FACEBOOK, INC., a Delaware
 corporation,

Plaintiff,

v.

BRANDTOTAL, LTD., an Israeli
 corporation, and
 UNIMANIA, INC., a Delaware
 corporation,

Defendants.

Case No.: 3:20-CV-07182-JCS

**ADMINISTRATIVE MOTION OF
 DEFENDANTS BRANDTOTAL, LTD.
 AND UNIMANIA, INC. TO FILE REPLY
 UNDER SEAL**

Judge: The Hon. Joseph C. Spero
 Ctrm.: Courtroom F – 15th Floor
 Date: October 26, 2020
 Time: 2:00 PM

1 Pursuant to Civil L.R. 7-11 and Civil L.R. 79-5, Defendants/Counterclaim Plaintiffs
2 BrandTotal, Ltd. and Unimania, Inc. (“BrandTotal”), by and through undersigned counsel,
3 respectfully move for administrative relief to file its unredacted Reply in Support of its Ex Parte
4 Motion for Temporary Restraining Order under seal, along with the supporting Declaration of
5 Alon Leibovich, and Exhibit P to also be filed under seal.

6 BrandTotal will publicly file redacted versions of the Reply and supporting documents
7 contemporaneously with the filing of this Motion.

8 Good cause exists for sealing of these documents. Information cited in the memorandum
9 and supporting documents reference BrandTotal’s confidential information, which if made public
10 would adversely impact BrandTotal.

11 The proposed sealing is narrowly tailored and only seeks to protect those limited portions
12 of the memorandum and supporting documents that contain sensitive financial and customer
13 identification information, which, if made public, would adversely impact both BrandTotal *and*
14 its customers. Because this is a motion for temporary restraining order, the law requires
15 Defendant BrandTotal to explain the irreparable harm it is experiencing in specific detail, which
16 necessary involves highly sensitive information.

17 No less restrictive means exist to achieve the overriding interest of protecting this
18 information. In absent of an order sealing BrandTotal’s sensitive financial information and
19 references to the names of BrandTotal’s customers, BrandTotal’s interests would be seriously
20 prejudiced.

21 This Administrative Motion to File Under Seal is accompanied by the supporting
22 Declaration of Rudolph A. Telscher, Jr. and a [Proposed] Order Granting BrandTotal’s
23 Administrative Motion to File Under Seal. Pursuant to Civil L.R. 79-5, BrandTotal lodges the
24 Requested Sealed Documents with this Court and respectfully requests leave to file them under
25 seal.

1 Date: October 22, 2020

Respectfully submitted,

2 By: /s/ Rudolph A. Telscher, Jr.

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26 ***Unimania, Inc.***
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October, 2020, I caused the foregoing to be filed electronically with the Clerk of Court and to be served via the Court's Electronic Filing System upon all counsel of record, and to be served via email on all counsel of record at the following:

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